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Attorneys for Defendants  
MOUNT DIABLO UNIFIED SCHOOL DISTRICT

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

BRET BAILEY,

Plaintiff,

vs.

MOUNT DIABLO UNIFIED SCHOOL  
DISTRICT,

Defendants.

Case No.: 3:24-CV-00188-AGT

**STIPULATION TO EXTEND TIME TO  
COMPLETE ADR \: ORDER**

Complaint Filed: January 10, 2024  
Trial Date: TBD

IT IS HEREBY STIPULATED by and between the parties, Plaintiff BRET BAILEY ("Plaintiff") and Defendant MOUNT DIABLO UNIFIED SCHOOL DISTRICT (the "District") (collectively, the "Parties"), as follows:

The parties met with Magistrate Judge Lisa J. Cisneros for a Pre-Settlement Conference to discuss dates for a settlement conference on November 14, 2024. The parties are unavailable for a settlement conference in December 2025, and they seek to engage in limited discovery for purposes of preparing their case for the upcoming settlement conference. At the moment, the deadline for ADR in this case is January 5, 2025.

1 The Court is available to conduct a settlement conference date on January  
2 17 and 31, 2025, and the parties are seeking an extension of time for the ADR  
3 deadline until February 5, 2025 to be able to conduct the settlement conference.

4 Pursuant to local rules, this document is being electronically filed through  
5 the Court's ECF System. In this regard, counsel for the District hereby attests that  
6 (1) the content of this document is acceptable to all persons required to sign the  
7 document; (2) Plaintiff's counsel has concurred with the filing of this document;  
8 and (3) a record supporting this concurrence is available for inspection or  
9 production if so ordered.

10 IT IS SO STIPULATED.

11  
12 Dated: November 22, 2024 **EISENBERG & BAUM, LLP**

13 /s/ Andrew Rozynski  
14 Attorney for Plaintiff  
15 BRET BAILEY

16  
17 Dated: November 22, 2024 **LEONE ALBERTS & DUUS, APC**

18 s/ Clariza C. Garcia  
19 CLARIZA C. GARCIA  
20 Attorney for Defendants  
21 MOUNT DIABLO UNIFIED SCHOOL DISTRICT

22 Date: November 25, 2024

